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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

PERSONALWEB TECHNOLOGIES, LLC AND  
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Defendant.

Case No. 5:16-cv-1266-EJD

**STIPULATED MOTION TO EXTEND FACT  
DISCOVERY COMPLETION FOR LIMITED  
PURPOSE OF TAKING DEPOSITION OF  
WASSEF KASSIS**

<sup>1</sup> Withdrawal of Archit P. Shah as counsel for defendant International Business Machines Corporation (“IBM”), and substitution of Mr. Shah with Lien Dang, is the subject of IBM’s pending Motion for Withdrawal and Substitution of Counsel (D.I. 166).

STIPULATED MOTION TO EXTEND FACT  
DISCOVERY COMPLETION FOR LIMITED  
PURPOSE OF TAKING DEPOSITION OF  
WASSEF KASSIS

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1 Pursuant to Civil Local Rule 6-2 and 7-12, Plaintiffs PersonalWeb Technologies LLC  
2 (“PersonalWeb”) and Level 3 Communications, LLC (“Level 3”) and Defendant International Business  
3 Machines Corporation (“IBM”), by and through their counsel of record, hereby jointly submit the  
4 following stipulation and proposed order extending the deadline for the close of fact discovery for the  
5 limited purpose of completing the fact deposition of Wassef Kassis. (*See* Ex. A.) The Patent  
6 Scheduling Order set the fact discovery cut-off as November 18, 2016.

7 WHEREAS the Patent Scheduling Order (Dkt. 165) set a fact discovery cut-off of November 18,  
8 2016;

9 WHEREAS the parties have met and conferred in good faith regarding deposition scheduling;

10 WHEREAS the parties determined that the best availability of third party deponent, Wassef  
11 Kassis, and the parties is November 21, 2016;

12 WHEREAS no previous time modifications have been sought in this Court;

13 WHEREAS the extension of time for this limited purpose will not affect the schedule for the  
14 case;

15 NOW THEREFORE, PersonalWeb, Level 3, and IBM agree and stipulate that extension of the  
16 fact discovery deadline for the limited purpose of taking the deposition of Wassef Kassis is necessary to  
17 complete fact discovery in this case.

18  
19 \* \* \* \*

20  
21 Dated: November 14, 2016  
22  
23  
24  
25  
26

27 STIPULATED MOTION TO EXTEND  
28 FACT DISCOVERY COMPLETION FOR  
LIMITED PURPOSE OF TAKING  
DEPOSITION OF WASSEF KASSIS

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**CERTIFICATE OF SERVICE**

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document *via* the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 14th day of November 2016.

/s/ Ryan M. Hubbard

Ryan M. Hubbard